REMARKS

In the Non-Final Office Action mailed February 28, 2008, the Examiner rejected claims 1 and 19 under 35 U.S.C. §112, first paragraph; rejected claims 1 and 19 under 35 U.S.C. §112, second paragraph; rejected claims 19-20, 23-26, and 28-29 under 35 U.S.C. §101 as unpatentable subject matter; and rejected claims 1-2, 5-8, 10-11, 18-20, 23-26, 28, and 29 under 35 U.S.C. §103 as unpatentable over U.S. Patent No. 6,460,043 to Tabbara et al. (Tabbara) in view of U.S. Patent Publication No. US2004/0260749 to Trossen et al. (Trossen).

By this amendment, Applicants amend the specification in response to the rejection under section 101; amend claims 1 and 19 to more clearly recite the features of those claims; and cancel claims 8, 10, 11, 18, 26, 28, and 29 without prejudice or disclaimer.

Claims 1, 2, 5-7, 19, 20, and 23-25 are currently pending.

Regarding the rejection under 35 U.S.C. §112, first paragraph, as discussed during the telephonic interview of June 2, 2008, Applicants submit that the specification supports the following features of claims 1 and 19: "the semantic object provider comprising an interface component to create an object, an implementation object to provide persistency, and an object registry to interact with a repository." See, e.g., instant application at paragraphs 0043-0050 and FIG. 3 at semantic object provider 65 (depicting "interfaceSemanticObject 66," SemanticObjectImpl 68," and "ObjectRegistry 70"). Because the specification supports the above-noted features of claims 1 and 19, the rejection of claims 1 and 19 under 35 U.S.C. §112, first paragraph, should be withdrawn.

For at least the reasons given above with respect to the rejection under 35 U.S.C. §112, first paragraph, the rejection under 35 U.S.C. §112, second paragraph, should be withdrawn.

On page 10 of the Final Office Action, the Examiner states that "Applicant's argument regarding rejection of claims 1 and 19 under 35 U.S.C. 103 stated as "Tabbara suggests or discloses the semantic object provider." To make the instant record clear, Applicants did not state that "Tabbara suggests or discloses the semantic object provider," but instead Applicants argued that Tabbara failed to (i.e., did not) disclose or suggest the "semantic object provider."

The Examiner rejected claims 1, 2, 5-7, 19, 20, and 23-25 under 35 U.S.C. §103 as unpatentable over Tabbara in view of Trossen. Applicants respectfully traverse this rejection. [1]

Claim 1, as amended, recites a combination of features including, among other things, "converting, at a semantic object provider, the received semantic request to a generic request having corresponding request parameters, the semantic object provider comprising an interface component to create an object, an implementation object to provide persistency, and an object registry to interact with a repository." Claim 1 also includes "initiating, by the semantic object provider, a creation of the object for receiving and converting the semantic request."

At page 10 of the Final Office Action, the Examiner alleges that Tabbara at col. 10, lines 55-56 discloses or suggests the "semantic object provider." A closer scrutiny of Tabbara at col. 10, lines 55-56 reveals that it fails to teach any form of a "semantic

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[1] This rejection lists the currently pending claims.

object provider," much less "the semantic object provider comprising an interface component to create an object, an implementation object to provide persistency, and an object registry to interact with a repository," as recited in claim 1. Instead, <u>Tabbara</u> at col. 10, lines 55-56 merely discloses "Predicates," not the claimed features noted above. Specifically, <u>Tabbara</u> states:

> Predicates: A Predicate provides the semantic context for Objects and consists of one or more Roles that Objects' play. The Predicate determines the nature of the Role an Object plays. Any Role can be attributive (that is, can define a Value of an Object type), as in "Business **100** has Name Café Lago". Or, a Predicate can define relationship between one Object and another, as in "Business **100** sells Product **200** ". FIG. 8A illustrates the information (SConceptualPredicate) kept for each Predicate. The DDF includes a unique ID for the Predicate, the canonical Predicate name, a count of Roles in the Predicate, an array of Role structures for each Role, and the stand-alone physical mapping information for the Predicate.

<u>Tabbara</u>, col. 10, lines 55-67. Indeed, <u>Tabbara</u>'s "Predicate" relates to "determines the nature of the Role an Object plays" and lacks any of the claimed structural features of a semantic object provider, such as "an interface component to create an object," an implementation object to provide persistency, and an object registry to interact with a repository." As a consequence, <u>Tabbara</u> fails to disclose or suggest at least the following feature of claim 1: "converting, at a semantic object provider, the received semantic request to a generic request having corresponding request parameters, the semantic object provider comprising an interface component to create an object, an implementation object to provide persistency, and an object registry to interact with a repository." Moreover, although <u>Trossen</u> discloses semantic binding in networks, it fails to cure the above-noted features of claim 1. Because neither <u>Tabbara</u> nor <u>Trossen</u>

discloses or suggests the noted features of claim 1, claim 1 is allowable over <u>Tabbara</u> and <u>Trossen</u>, whether taken alone or in combination. Therefore, the rejection of claim 1 and claims 2 and 5-7, at least by reason of their dependency from independent claim 1, should be withdrawn.

Since neither <u>Tabbara</u> nor <u>Trossen</u> teaches a "semantic object provider," neither reference suggests or discloses the "initiating, by the semantic object provider, a creation of the object for receiving and converting the semantic request" feature of claim 1. Because neither <u>Tabbara</u> nor <u>Trossen</u> discloses or suggests the noted features of claim 1, claim 1 is allowable over <u>Tabbara</u> and <u>Trossen</u>, whether taken alone or in combination. Therefore, the rejection of claim 1 and claims 2 and 5-7, at least by reason of their dependency from independent claim 1, should be withdrawn for this additional reason.

Independent claim 19, although of different scope, includes features similar to those noted above for claim 1. For at least the reasons given above with respect to claim 1, claim 19 as well as claims 20 and 23-25, at least by reason of their dependency from corresponding independent claim 19, are allowable over <u>Tabbara</u> and <u>Trossen</u>, whether taken alone or in combination, and the rejection of those claims under 35 USC § 103(a) should be withdrawn.
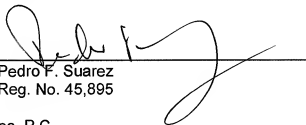
CONCLUSION

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner. Applicants submit that the proposed amendments do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner. Therefore, this Amendment should allow for immediate action by the Examiner. Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner continue to dispute the patentability of the pending claims.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. Applicants are concurrently filing herewith a Petition for a one-month extension of time with the requisite fee. No additional fees are believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-081/2002P10157US. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

Date: <u>18 June 2008</u>

Pedro F. Suarez
Reg. No. 45,895

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
3580 Carmel Mountain Road
Suite 300
San Diego, CA 92130
Customer No. 64280
Tel.: 858/314-1540
Fax: 858/314-1501